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May 20, 2020

BY ECF

Hon. Mary Kay Vyskocil
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Granted. SO ORDERED.

Date: 5/21/2020
New York, New York

A handwritten signature in black ink that reads 'Mary Kay Vyskocil'. Below the signature, the name 'Mary Kay Vyskocil' and the title 'United States District Judge' are printed in a serif font.
Mary Kay Vyskocil
United States District Judge

Re: *R3Asia Pacific, PTE, LTD and R3 Worldwide, Inc. v. Melissa Lea*
U.S. District Court, Southern District of New York
Case No. 1:20-cv-01941

Dear Judge Vyskocil:

Pursuant to Fed. R. Civ. P. 6(b), Local Rule 7.1(d), and Rule 2.G of Your Honor's Individual Rules of Practice in Civil Cases, Defendant Melissa Lea, by her counsel, moves, with agreement and consent of Plaintiff's counsel, to extend from May 21 until June 4, 2020 the date for Defendant to file and serve a pleading in response to the Complaint and Summons served April 16, 2020. The original due date was May 7, 2020. There has been one prior extension, jointly requested by the parties to allow ongoing settlement discussion. The reason for the current request is the parties, through counsel, have made substantial progress toward settlement and are now working on but have not yet reached a definitive written settlement agreement. There is good cause for submission of this request less than 72 hours prior to the May 21 deadline because final negotiation and review of a written agreement have been understandably slowed by Plaintiff's lead counsel dealing with a death in his immediate family, and the resources of the Court and the parties will be conserved by the requested extension.

For the above reasons, Defendant respectfully requests a two-week extension of time until June 4, 2020 to file and serve a pleading in response to the Complaint and Summons.

Respectfully submitted,

Joshua N. Ruby

Counsel for Defendant Melissa Lea

JNR/jlf

cc: Christian J. Jensen, Esq. (via ECF)
Howard Matalon, Esq. (via ECF)
Stanley K Shapiro, Esq. (via ECF)
T. Christopher Donnelly (via Email)